



6200 Oak Tree Boulevard
Independence OH
216-447-3100

Mail Address:
P.O. Box 94661
Cleveland, OH 44101-4661

EPA Region 5 Records Ctr.



338073

September 17, 1993

VIA OVERNIGHT MAIL

Ms. Marsha A. Adams, 5HSM-5J
Responsible Party Search Section
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

RECEIVED
SEP 21 1993
SUPERFUND PROGRAM
MANAGEMENT BRANCH

Dear Ms. Adams:

Re: Request for Information Pursuant to
Section 104(e) of CERCLA for the
Stickney Avenue Landfill and Tyler
Street Dump Sites in Toledo, Ohio

Enclosed in accordance with Chief Thomas W. Mateer's August 12, 1993 letter is the Response of The Toledo Edison Company to the referenced Request for Information.

Please direct any future correspondence or inquiry on this matter to myself or to Mary O'Reilly as counsel for The Toledo Edison Company.

Yours very truly,

A handwritten signature in dark ink, appearing to read 'William J. Kerner', written in a cursive style.

William J. Kerner
Principal Counsel

WJK:pb

Enclosure

cc: T. H. Kirk
R. R. Perry
M. E. O'Reilly

**RESPONSE OF THE TOLEDO EDISON COMPANY
TO THE REQUEST FOR INFORMATION FOR
THE STICKNEY AVENUE LANDFILL AND THE TYLER STREET DUMP SITE
LOCATED IN TOLEDO, OHIO**

GENERAL OBJECTIONS

1. The Toledo Edison Company is a defendant in a pending civil action captioned City of Toledo v. Allied-Signal, Inc., et al., Case No. 3:90 CV 7140 (N.D. Ohio) involving the Dura Avenue Landfill in Toledo, Ohio, and therefore objects to the Information Requests to the extent such requests seek information protected under the authority of 28 U.S.C. §2072, and other statutory and common law by the attorney-client or attorney work-product privileges.
2. The Toledo Edison Company is a defendant in a pending civil action captioned City of Toledo v. Allied-Signal, Inc., et al., Case No. 3:90 CV 7140 (N.D. Ohio) involving the Dura Avenue Landfill in Toledo, Ohio, and therefore objects to the Information Requests to the extent such requests conflict with the privileges and protections granted to The Toledo Edison Company under the rules established pursuant to 28 U.S.C. §2072.
3. The Toledo Edison Company objects to Instruction No. 3 on the basis that CERCLA does not mandate that a response "identify all contributing sources of information", nor is it at all clear what this phrase in the instructions means. Additionally, The Toledo Edison Company is not

producing any material which is subject to the attorney-client privilege or other privilege, or which constitutes protected attorney-work product, or which is not otherwise discoverable.

4. The Toledo Edison Company objects to any attempt by EPA to create through Instruction No. 4 a continuing duty for The Toledo Edison Company to supplement its response on the ground that such instruction exceeds the statutory authority of CERCLA. Without waiving its objection, however, if The Toledo Edison Company becomes aware of any information that demonstrates its response was incorrect when made, though believed to be correct when made, or is no longer true, then The Toledo Edison Company will voluntarily supplement its response.
5. The Toledo Edison Company objects to Instruction No. 6 for the reason that it is unduly burdensome and overbroad by seeking to require responses based upon "all information and documents" in the "possession, custody or control" of "former or current employees, agents, servants, contractors or attorneys." The Toledo Edison Company further objects to Instruction No. 6 for the reason that CERCLA §104(e) does not require The Toledo Edison Company to furnish EPA with information outside of its control, as would be the case with former employees and contractors.
6. The Toledo Edison Company objects to Instruction No. 7 to the extent that the words "may have" concerning knowledge of operations, hazardous substance use, storage, treatment, releases, spills, disposal or handling practices calls for guessing or speculative responses. Additionally, the letter's instructions exceed the scope of the statute. CERCLA does not

require that The Toledo Edison Company certify or notarize the answers to the Information Request. Without waiving its objections, The Toledo Edison Company states that it has conducted a review of relevant corporate records and has performed a reasonable inquiry of employees knowledgeable of the matters raised in the Information Request regarding the Site.

7. The Toledo Edison Company objects to Definition No. 1 on the basis that "you" and "Respondent" are defined to include contractors, trustees and agents, which is beyond the scope of inquiry set out in CERCLA. Section 104(e) of CERCLA does not require The Toledo Edison Company to furnish EPA with information outside of its control.
8. The Toledo Edison Company objects to Definition No. 4 to the extent that it expands the definition of "hazardous substance" contained in CERCLA by including petroleum products. However, without waiving its objection, The Toledo Edison Company will employ this definition in the formulation of its responses.

INFORMATION REQUEST 1:

Identify all persons consulted in the preparation of the answers to these Information Requests.

Response 1:

The Toledo Edison Company states that in the investigation conducted by Wilbur L. Headen, Corporate Security Agent of Centerior Service Company, 55 Public Square, Cleveland, Ohio 44101, the following current and former employees and other persons were consulted in the preparation of these Information Requests:

Dennis Asman, 6525 Hagman Road, Toledo, Ohio

Thomas Barounis, USEPA, 77 West Jackson Boulevard, Chicago, Illinois

Gary Beren, Edelstein & Sons, 1370 LaGrange Avenue, Toledo, Ohio

John Bohnsack, 4232 Blackthorn, Toledo, Ohio

Leland Bradley, 6200 Oak Tree Boulevard, Independence, Ohio

Kenneth Brancheau, 2920 Isha Laye Drive, Toledo, Ohio

Billy Coker, 1642 Crestwood Avenue, Toledo, Ohio

Matthew Collins, Acme Station, 1401 Front Street, Toledo, Ohio

Richard Crouse, 240 Twin Creeks Drive, Chagrin Falls, Ohio

Reginald Crowell, 6016 Sylvan Green, Sylvania, Ohio

Sherri Estes, USEPA, 77 West Jackson Boulevard, Chicago, Illinois

Wesley Ewing, 5665 Firethorne Drive, Toledo, Ohio

Wendell Johnson, 2705 Pine Knoll, Toledo, Ohio

Drew Koet, 6233 Hagman Road, Toledo, Ohio

Richard May, 3729 Dewlawn Drive, Toledo, Ohio

Ralph McBee, 2250 Densmond Drive, Toledo, Ohio

Leonard Merritt, 104 Dickens Street, Toledo, Ohio

Richard Mohler, 4827 Brott Road, Toledo, Ohio

Joseph Murphy, 6844 Carrietowne Lane, Toledo, Ohio

Michael R. Myers, Acme Station, 1401 Front Street, Toledo, Ohio

Kenneth A. Pfeffer, 4640 Hinckley Industrial Parkway, Cleveland, Ohio

Robert L. Perry, 3854 Dikway Street, Toledo, Ohio

Robert R. Perry, 6200 Oak Tree Boulevard, Independence, Ohio

Robert Rodi, 1001 W. Delaware Avenue, Toledo, Ohio

INFORMATION REQUEST 2:

Identify all documents consulted, examined, or referral (sic) to in the preparation of the answers to these Requests and provide copies of all such documents.

Response 2:

The Toledo Edison Company is a defendant in a pending civil action captioned City of Toledo v. Allied-Signal, Inc., et al., Case No. 3:90 CV 7140 (N.D. Ohio) involving the Dura Avenue Landfill in Toledo, and therefore objects to Information Request 2 to the extent it seeks information protected by the attorney work-product or attorney client privileges, which privileges are established pursuant to 28 U.S.C. §2072 and other statutory and common law. The Toledo Edison Company further objects to Information Request 2 to the extent such request conflicts with the privileges and protections granted to The Toledo Edison Company under the rules established pursuant to 28 U.S.C. §2072. Documents protected by the attorney work-product and attorney client privileges are maintained by joint defense counsel at the law office of Fuller & Henry, 17th Floor, One Seagate, Toledo, Ohio.

Without waiving the foregoing objections, Respondent utilized and herewith provides the following documents:

Memorandum from Kenneth A. Pfeffer, Records Management Coordinator/CRC, dated 8-27-93, see Attachment I; and Toledo Edison Company Records Retention Schedule, dated 3-1-84, see Attachment II.

INFORMATION REQUEST 3:

If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Requests or who may be able to provide additional responsive documents, identify such persons.

Response 3:

The Toledo Edison Company's investigation as conducted by Wilbur L. Headen did not disclose information which gave reason to believe that there may be other persons who might be able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents relative to the Information Request.

INFORMATION REQUEST 4:

List the EPA Identification Numbers of the Respondent.

Response 4:

The Toledo Edison Company's currently existing facilities - none of which are known to have disposed of hazardous wastes or substances at the Stickney Avenue and Tyler Road Sites - are as follows:

<u>LOCATION</u>	<u>RCRA I.D. NUMBERS</u>
ACME GENERATING STATION	OHD000821371
BAY SHORE GENERATING STATION	OHD000821389
DAVIS-BESSE NUCLEAR POWER STATION	OHD000720508
DEFIANCE SERVICE CENTER	OHD000720482
DELAWARE SERVICE CENTER	OHD020286118
HOLLAND OPERATIONS CENTER	OHD000270516
LAKEWOOD OPERATIONS CENTER	OHD000821363
LINDSEY SERVICE CENTER	OHD000720490
TOLEDO EDISON PLAZA	OHD000821355
WAUSEON SERVICE CENTER	OHD000720474

INFORMATION REQUEST 5:

Identify the acts or omissions of any person, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants, and damages resulting therefrom.

Response 5:

The Toledo Edison Company objects to this request on the grounds that it is overbroad and not related to the Site at issue. However, without waiving the foregoing objection, but assuming that this request is intended to be related to the Site at issue, The Toledo Edison Company objects to this request to the extent it is intended or may be construed by any person or entity to be an admission that acts or omissions of Toledo Edison's employees, contractors, or agents caused a release or threat of release of hazardous substances, pollutants or contaminants at the Site. However, should it be determined by a judicial or similar body that agents, contractors or employees of The Toledo Edison Company caused or contributed to a release or threat of release of hazardous substances, contaminants or pollutants at the Site, nothing in this response is intended or shall be construed as a waiver of any rights of contribution, indemnification or other recovery that may exist at law or in equity against such agent, contractor or employee.

Without waiving the foregoing objections, The Toledo Edison Company states that its investigation as conducted by Wilbur L. Headen disclosed no information or records identifying any such other acts or omissions.

INFORMATION REQUEST 6:

Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of material at the Site.

Response 6:

The Toledo Edison Company states that in the investigation conducted by Wilbur L. Headen only one person was identified as having knowledge or information about the generation, transportation, or disposal of material at the Site, as follows:

On August 31, 1993, Richard Mohler, 4827 Brott Road, Toledo, Ohio, advised that he worked for Toledo Edison for approximately 38 years from 1946 to 1989. He retired as a Foreman of the Underground Department at Delaware Service Center. He remembers dumping construction material such as stone, concrete, dirt and lumber at both the Stickney Avenue Landfill and Tyler Street Dump Site and the Dura Avenue Landfill.

Mohler worked as a truck driver in the Underground Department at Delaware Service Center, where he was one of about seven or eight drivers. Company trucks hauled the construction material to these sites almost on a daily basis. Mohler never transported or knew of any employee delivering contaminated or hazardous materials or waste to any dump sites. These dumps were operated by the City and everybody in the area dumped at these sites.

Mohler was not sure who made the arrangements to dispose of materials at the dump site locations.

INFORMATION REQUEST 7:

Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site. In addition, identify the following:

- a) The persons with whom you or such other persons made such arrangements;
- b) Every date on which such arrangements took place;
- c) For each transaction, the nature or the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;
- d) The owner of the waste materials or hazardous substances as accepted or transported;
- e) The quantity of the waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;
- f) All tests, analyses, and analytical results concerning the waste materials;

- g) The person(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported;
- h) The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;
- i) Where the person identified in g) above intended to have such hazardous substances or waste materials transported and all evidence of this intent;
- j) Whether the waste materials or hazardous substances involved in each transaction were trans-shipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;
- k) What was actually done to the waste materials or hazardous substances once they were brought to the Site;
- l) The final disposition of each of the waste materials or hazardous substances involved in such transactions;
- m) The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the waste material and hazardous substance involved in each transaction.

- n) The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;
- o) The price paid for (i) transport (ii) disposal or (iii) both of each waste material and hazardous substance.
- p) All documents containing information responsive to a - o above or in lieu of identification of all relevant documents, provide copies of all such documents.
- q) All persons with knowledge, information, or documents responsive to a - p above.

Response 7:

The Toledo Edison Company states that its investigation as conducted by Wilbur L. Headen did not identify any persons who may have arranged for the disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site other than the information on the construction type wastes disposed of at the Site as noted in Response 6.

INFORMATION REQUEST 8:

If your waste was not taken to the Stickney Avenue Landfill Site or the Tyler Street Dump Site during the period from 1951 to 1981, where were your wastes taken and how were they disposed.

Response 8:

The Toledo Edison Company objects to this Information Request to the extent it seeks a response as to other waste sites which bear no relation to the Site at issue. Without waiving the foregoing objection, The Toledo Edison Company states that in addition to the wastes identified in Response 6 as having been taken to the Stickney Avenue Landfill and Tyler Street Dump Site and the Dura Avenue Landfill, the investigation as conducted by Wilbur L. Headen disclosed information regarding where other Toledo Edison Company wastes were taken and how they were disposed, as follows:

On August 30, 1993, Robert Rodi, General Manager of Toledo Operations/
TOL1842, advised that he has been General Manager of Holland and Delaware Service Centers since 1980. Lakewood Service Center became his responsibility in 1984. Rodi was not aware of the Stickney Landfill or the Tyler Avenue Dump Site, but he remembers the Dura Landfill and that Stickney may be near Dura. Rodi believes waste might have gone to Dura from some of Toledo Edison's facilities, but he does not know what was disposed of at Dura. Rodi seemed to remember a landfill known as Evergreen located in Northwood, Ohio, where wooden poles were disposed of.

The poles were transported by either BFI or Waste Management, whichever was the successful bidder for the contract that was bid on from year to year.

On August 31, 1993, Leonard Merritt, 104 Dickens Street, Toledo Ohio, advised that he never heard of the Stickney Avenue Landfill or the Tyler Street Dump Site. He retired from Toledo Edison after 32 years of service from 1947 to 1989. He worked at Delaware Service Center in Construction Underground and the Transformer Shop and his last work assignment was Superintendent of Construction Underground.

Merritt remembers dumping at Dura Landfill and at another dump site near the Acme Station but he does not remember what the dump site was called.

Both Dura and the other dump site were owned by the City and were used by everyone. Nothing hazardous or contaminated was disposed of at these sites by Toledo Edison; just ordinary trash like paper and wood.

On August 31, 1993, Robert L. Perry, 3854 Dikway Street, Toledo, Ohio, advised that he is not familiar with the Stickney Avenue Landfill and Tyler Street Dump Site. He does remember a site on the east side of Toledo, but cannot recall its name, and Dura. Dirt, wood, paper and concrete were dumped; nothing of a hazardous or contaminated nature.

He was foreman in the Underground Department at Delaware Service Center before retiring. He retired after 37 years of service from 1946 to 1983.

On 9-1-93, Billy Coker, 1642 Crestwood Avenue, Toledo, Ohio, advised that he was employed at Toledo Edison for 34 years from 1950 to 1984. The last 13 years he was a Foreman in the Transformer Shop. No transformers went to any dump sites from Toledo Edison. He has no recollection of Stickney Avenue Landfill or Tyler Street Dump Site.

Used oil was given away to someone in Michigan and he believes Edelstein Company bought transformers and capacitors. He believes that persons who might have had more pertinent information have passed away.

On 9-1-93, Wesley Ewing, 5665 Firethorne Drive, Toledo, Ohio, advised he was employed at Toledo Edison from 1945 to 1982. During the later years he was Foreman of Underground at Delaware and Holland Service Center. He remembers dumping wood, concrete and dirt at a city dump located on Central Avenue.

On 9-2-93, Richard Crouse, recently retired Vice President of Centerior Fossil Operations, 240 Twin Creeks Drive, Chagrin Falls, Ohio, advised he has never heard of the Stickney Avenue Landfill or the Tyler Street Dump Site. During his years with Toledo Edison he worked at the generating plants. He has heard of Dura and Evergreen but cannot provide any details about them.

He advised the plants never transported anything to dump sites, and that contract companies were used.

James Bohnsack, 4232 Blackthorn, Toledo, Ohio, advised he was employed at Toledo Edison for 32 years from 1958 to 1990. He worked at both the Acme and Bay Shore Stations. He has never heard of Stickney or Tyler Dump Site. The plants used contractors BFI or Waste Management to haul plant trash. Bohnsack has heard of Dura and Evergreen Landfill but knows nothing about them.

On 9-7-93, **Wendell Johnson, retired President of Toledo Edison, 2705 Pine Knoll, Toledo, Ohio,** advised he worked at Delaware Service Center during the mid-1960's in the Transformer Department. He has never heard of the Stickney Avenue Landfill or the Tyler Street Dump. Waste oil from the transformers was given to some oil company. He does not remember the name. Transformers went to A. Edelstein & Sons. Johnson could not recall any landfill sites.

On 9-8-93, **Richard May, 3729 Dewlawn Drive, Toledo, Ohio,** advised that he retired from Toledo Edison in 1987 after 38 years of service. He was Plant Construction Superintendent. May worked at all of the facilities in the Metropolitan Toledo Area. He worked between 8 to 14 years in Distribution and Substations. He remembers giving waste oil to a company during the early 1950's but does not remember the name of the company. May has never heard of Tyler Street Dump Site, but has heard of Stickney Avenue Landfill. He was not involved in disposing waste at this site and has no pertinent information.

On 9-10-93, **Leland Bradley, Accountant/CSC, 6200 Oak Tree Boulevard, Independence, Ohio,** advised that there may be some records available indicating that BFI and Waste Management did some sort of business with Toledo Edison, but it is not known if any records mention Evergreen Landfill. Toledo

did not file invoices by name but by check number. He stated that if necessary, records could be researched, but that this activity would be very tedious and time consuming.

On 9-13-93, Dennis Asman, Sales Manager for Waste Management, 6525 Hagman Road, Toledo, Ohio, advised his company never dumped any materials picked up at Toledo Edison area facilities at the Stickney Avenue Landfill or Tyler Street Dump Site or any other municipal dump sites in Toledo. Waste Management has its own private dump site. Nothing hazardous or contaminated was obtained from Toledo Edison. Waste Management went public in 1972. Asman was not sure when they began doing business with Toledo Edison. Asman has no idea if any records exist showing business transactions with Toledo Edison.

On 9-13-93, Gary Beren, Owner of A. Edelstein & Sons, 1370 LaGrange Avenue, Toledo, Ohio, advised this company has been doing business with Toledo Edison since 1938. He remembers the Stickney Avenue Landfill and the Tyler Street Dump Site. Edelstein never dumped any material from Toledo Edison at these sites.

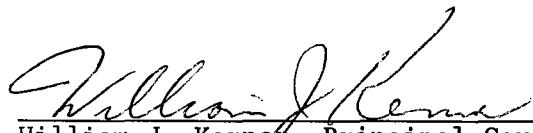
His company bought transformers and capacitors from Toledo Edison and they were recycled, not disposed of. The only records available are in Beren's head. He says during 1951 records were disposed of after five or six years. Beren believes most of the people he did business with are deceased.

On 9-14-93, Drew Koet, Special Waste Manager for Browning Ferris Industries (BFI), 6233 Hagman Road, Toledo, Ohio, advised that he has no knowledge of the Stickney Avenue Landfill or the Tyler Street Dump Site. He began his employment with this company in 1983. He believes that this company came into existence sometime in 1972 and began doing contract service for Toledo shortly afterwards. BFI has its own dump site and would not have used any municipal dumps in Toledo. To the best of his knowledge no records exist indicating any business transactions with Toledo Edison during the time periods indicated to him.

On 9-15-93, Michael R. Myers, Security Supervisor/Investigator for TE, TOL1922, advised that the Evergreen Landfill is located in Northwood, Ohio. The dump site near Acme Station was called Consaul and Wheeling Dump and was owned and operated by the City of Toledo. A trailer park occupies the space where this dump site was located. The trailer park has been around for approximately 20 years. East side and Central Avenue dump sites are not known.

Respectfully submitted,

THE TOLEDO EDISON COMPANY

By: 
William J. Kerner, Principal Counsel
Centerior Service Company
6200 Oak Tree Boulevard, Room 455
Independence, OH 44131
(216) 447-3252

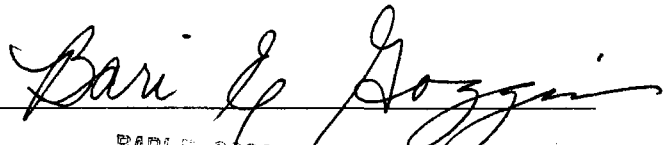
AFFIDAVIT

State of Ohio)
) ss:
County of Cuyahoga)

Now comes Thomas H. Kirk, Manager of Corporate Security of Centerior Service Company, which like The Toledo Edison Company is a wholly-owned subsidiary of Centerior Energy Corporation, who first being duly sworn, states that he is Manager of Corporate Security for Centerior Service Company, that upon request of legal counsel he has read the Request for Information for the Stickney Avenue Landfill and the Tyler Street Dump Site issued to The Toledo Edison Company and has directed his Security personnel to conduct a diligent record search and a diligent interviewing process with present and former employees who may have knowledge responsive to such Request for Information, and that to the best of his information and belief such record search and interviewing process has been completed.



Sworn to and subscribed before me this 17th day of September, 1993.



BARI E. GOGGINS, Attorney
NOTARY PUBLIC - STATE OF OHIO
My commission has no expiration date.
Section 147.03 R. C.

ATTACHMENT I

CENTERIOR ENERGY
M E M O R A N D U M

To: W. L. Headen From: K. A. Pepper Date: August 27, 1993
Phone: 43792 Mailstop: CRC
Subject: USEPA CERCLA Section 104(e)
Request for Information for
the Stickney Avenue Landfill
and Tyler Street Dump Sites,
1951 through 1981

No information was found regarding the Stickney Avenue Landfill or Tyler Street Dump Sites in response to your inquiry, although records searches were conducted as follows:

Toledo Purchase Order File (on microfilm)

No reference to either the Stickney Avenue Landfill or Tyler Street Dump Sites. Retention schedule for purchase orders was six years prior to 1979; therefore, no purchase order file exists prior to that date except those kept by Davis-Besse construction.

Check Packages (Vouchers, Invoices & Supporting Documents)

Voucher Index Registers (1967-1979) are on microfilm. No checks were written to either the Stickney Avenue Landfill or Tyler Street Dump Sites during that time period. No registers prior to 1967 were found which coincides with the twenty-five year retention period.

Records storage box #24549 (D-35-I) contains registers for 1980-1985. No references to the Stickney Avenue Landfill or the Tyler Street Dump Sites were found.

I spoke to Wayne Williamson, Facilities Services Supervisor in Toledo, regarding this matter, but he had no knowledge of the Stickney Avenue Landfill or Tyler Street Dump Sites and was not aware of anyone who might have information relative to this search.

Questions related to hazardous materials, tax returns, financial statements and by-laws should be referred to specific departments.

To my knowledge, there are no documents referring to the Stickney Avenue Landfill or the Tyler Street Dump Sites in the records stored at the Corporate Records Center.

cc: E. A. Basta

Response 15:

Toledo Edison objects to this interrogatory because it seeks information which requires an opinion of an attorney and is protected by work product. In addition, it is overly broad, vague and ambiguous, seeks information not related to the Dura site and assumes facts which are neither established nor admitted. Specifically, this interrogatory assumes that Toledo Edison's operations involve the handling, use, generation, transportation or disposal of hazardous substances.

Without waiving its objection, Toledo Edison identifies the following persons with the following described information:

Harvey Clifton, retired Toledo Edison Underground Electrical Mechanic, remembers transporting asphalt, dirt, concrete and wood while working as a laborer at the West Delaware Service Center.

Thomas J. Kozak, retired Vice President of Operations, advised that Toledo Edison did use Dura, that he does not know any of the details and that most of the people who would have such knowledge are deceased.

Leonard H. Merritt, retired Supervisor of Underground Lines, indicated his belief that Toledo Edison dumped concrete at Dura Avenue Landfill.

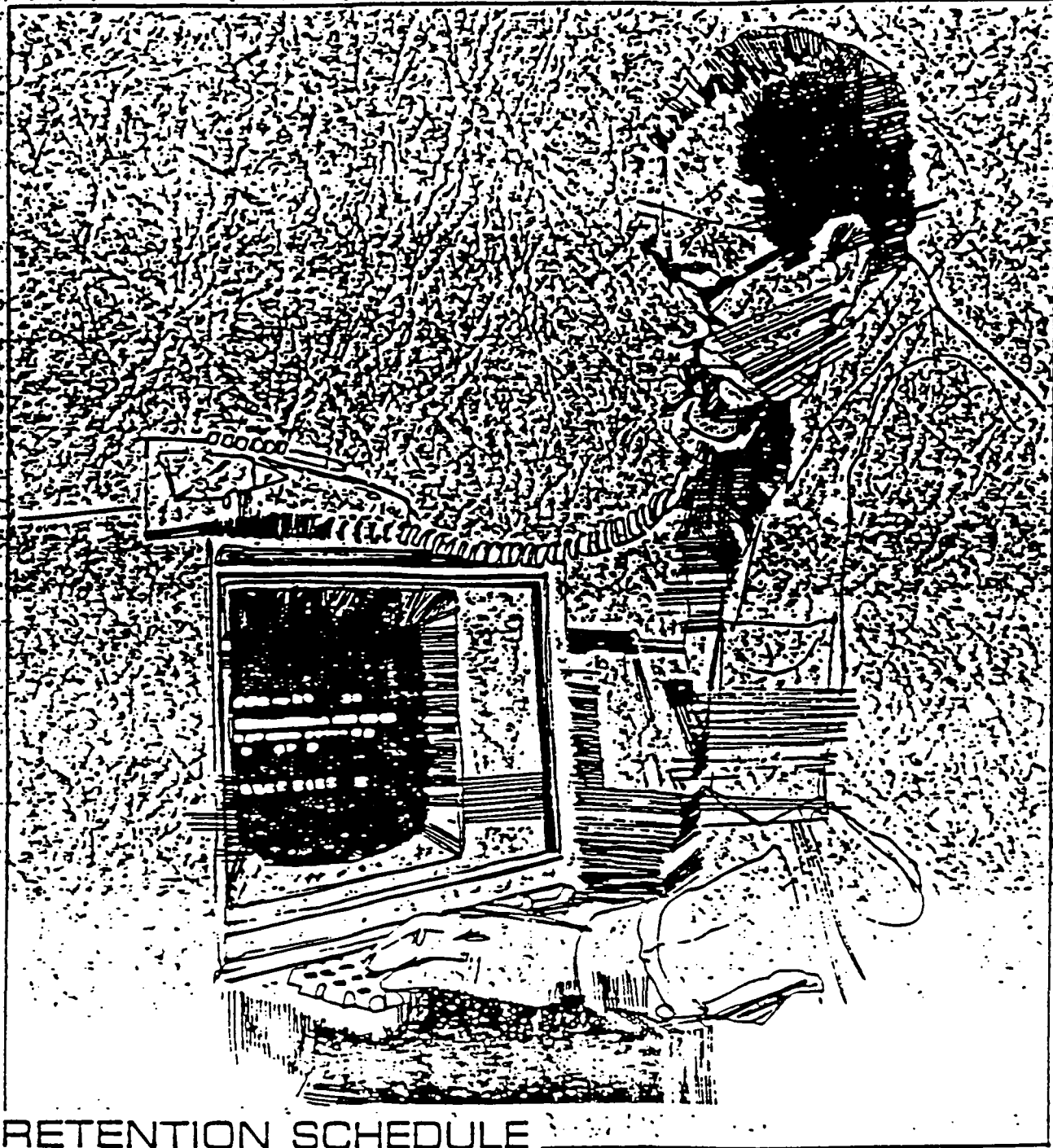
Joseph F. Pakalski, retired Underground Electrical Mechanic, advised he remembers cleaning an incinerator as a helper at Delaware Service Center, and hauling the ashes to Dura Avenue Landfill in Company trucks.

Oliver Pierce, retired equipment tester, indicated his belief that wood delivery crates from transformers were disposed of at Dura Avenue Landfill using Company trucks.

Charles W. Sasse, retired Underground Line Supervisor, indicated that he had no concrete information pertaining to Dura Avenue Landfill, but believes that sealed capacitors were disposed of at Dura Avenue Landfill.

Charles R. Whitney, retired Electrical Mechanic, indicated he dumped rocks, wood, and dirt for disposal at Dura Avenue Landfill.

INFORMATION & RECORDS MANAGEMENT



RETENTION SCHEDULE

TOLEDO EDISON COMPANY
RECORDS RETENTION SCHEDULE

COPY NO. _____

ISSUED TO _____

FERC 18CFR125
NRC 10CFR20
NRC 10CFR50
PUCO 4901:1-9-06


EFFECTIVE 3/1/84

TOLEDO EDISON COMPANY
RECORDS RETENTION SCHEDULE

The documents listed in the following retention schedule meet, or, in many instances, exceed the retentions established by the Federal Energy Regulatory Commission (FERC) and the Public Utilities Commission of Ohio (PUCO). The purpose of this schedule is to provide departments with a basic definition of their responsibility for records retention.

As a general rule, those documents referred to on a daily or weekly basis, whether the media be microfilm or hard copy, should be kept within individual departments as work tools. Any document requiring less frequent reference should be stored in the Records Centers and signed out on an as-needed basis.

The Company is committed to transferring as many documents (active and inactive) as possible to microfilm media. Questions or uncertainties regarding interpretation and application of records retention or micro-filming procedures should be directed to the Records Services Supervisor.


Corporate Secretary

General Information

1. The regulations in this document do not excuse compliance with any other lawful requirement for preservation of records beyond the period prescribed herein.
2. Records not covered by these rules may be destroyed at option, provided they are not required for retention by other legislative authorities or used in lieu of records listed.
3. Unless otherwise specified, duplicate copies of records may be destroyed at any time, provided that the duplicate copies contain no significant information not shown in the original.
4. For the purpose of these regulations, the data constituting the records listed in the retention schedule may be retained in any of the media forms below, provided that the media selected has a standard life expectancy equal to or greater than the specified retention period.

<u>Media</u>	<u>Expected Life</u>
Paper & Card Stock	Archival Permanency
Magnetic Tape	5 years in controlled environment
Paper Tape	Archival Permanency
Microfilm	Archival Permanency in controlled environment
Metallic Recording Data Strips	Archival Permanency in controlled environment

Detailed regulations governing storage environment and conversion of media form may be referenced in FERC 18CFR125.

5. Wherever the records, herein required for retention, are kept or stored, they shall be arranged, filed and currently indexed so that they may be readily identified and made available to representatives of the Commissions.
6. The destruction of records permitted to be destroyed may be performed in any manner. However, precautions should be taken to destroy the legibility of records when their content is forbidden by law to be disclosed to unauthorized persons.
7. When any records are destroyed before the expiration of the prescribed period of retention, a certified statement describing the extent and circumstances of premature destruction must be filed within ninety (90) days of discovery of the destruction.

TOLEDO EDISON COMPANY
RECORDS RETENTION SCHEDULE

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
A		
Accident Reports	FERC	6
Accounting Procedures Bulletins	Administrative Systems	Until Superseded
Acquisition Valuations	Property Accounting	Permanent
Acquisition Valuations	Tax	Permanent
Air Conditioning Cash Payments	Customer Accounting	6
Alpha List TECo Customers	Customer Services	6
Annual Meeting Notice	Finance	10
Annual Reports	Accounting Analysis	Permanent
American Electric Power		
Cin. Gas & El.		
CEI		
Columbus & Southern		
Consumers Power		
Dayton Pwr. & Light		
Detroit Edison		
Duquesne Light		
Ohio Edison		
Ohio Power		
Pennsylvania Power		
Toledo Edison		
Other		5
Applications and Contracts for Extension of Lines - Contribution by Customer	PUCO	6 Months
Applications and Contracts for Extension of Lines - Refundable Deposits	PUCO	1 Year After Refund
Applications for Service (Sheet Contracts)	Customer Services	Permanent
Applications, General	Employment	6 Months
Applications, Nuclear	Employment	2
Applications, Apprenticeship	Employment	5

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Area-Function Changes	General Accounting	5
Articles of Incorporation	Treasury	Permanent
Audits, Internal	Operational Auditing	7
 <u>B</u>		
Bad Debt Reserve (BDR) Ledgers	General Accounting	7
Bank Deposit Slips and Books	General Accounting	1
Bank Drafts	General Accounting	2
Bank Plan Books	Customer Accounting	1
Bank Reconciliations	General Accounting	2
BDR's (Cash Transfer)	Customer Services	3
Bill Adjustments	Customer Services	3
Bill History	Customer Services	6
"Blue Book"	Accounting Analysis	Permanent
Board of Directors Minutes	Corporate Secretary	Permanent
Board of Directors Reports	General Accounting	Permanent
Bonds, Mortgage (and Ledgers)	Treasury	50
Buckeye Power Mo. Summary	Customer Accounting	6
Budget, Department Data	Accounting Analysis	5
 <u>C</u>		
Cancelled Stock Certificates	Treasury	Permanent
CAPCO Agreements	Finance	Permanent
Cash Plans	Finance	10
Cash Receipts Register Tapes	Customer Services	6
Cash Sales	Customer Accounting	6
Cash Stubs - General Ledger	General Accounting	6
Cash Stubs	Customer Services	1

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Cash Transfers	Customer Services	3
Cashiers Daily Data Including		
Cash Tapes	Customer Services	1
Collectors Daily Reports	Customer Services	1
Check Reconciliations, General		
Payroll	General Accounting	3
Checks, Cancelled Dividend	Treasury	6
Checks:		
Payroll	General Accounting	3
Pension	General Accounting	3
Special Refund	General Accounting	Permanent
Voucher	General Accounting	7
CIS Month End Balancing Files	Customer Accounting	7
Claims	Customer Accounting	6
Claims	Real Estate & Claims	6 Years After Settlement or 10 Years After Occurrence
Claims, Workmen's Compensation	Real Estate & Claims	Permanent
Clippings	Public Relations	6
Coal Cost Report Summary	General Accounting	5
Coal Purchase Orders	Fossil Fuel Procurement	20
Coal Receiving Reports	General Accounting	6
Computer Log Sheets	Data Processing	2
Construction Function Record	General Accounting	Permanent
Construction Records Unrelated to Basis of Entries to Accts.	FERC	Destroy at Option
Construction Work-In-Progress Ledgers	FERC	6 Years After Plant Retirement
Consumers Council Gov. Board	Rate	5
Contracts, Customer Sheet	Customer Services	Permanent
Contracts, Company (in vault)	Miscellaneous	Permanent

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Correspondence	FERC/PUCO	Destroy at option, or as related to like documents
Correspondence	Commercial	5
Correspondence, Miscellaneous	Customer Accounting	6
Correspondence, Customer	Customer Services	2
Correspondence, Special	Customer Services	3
Correspondence, Duplicate	Research & Development	10
Correspondence, Investor Contact	Finance	10
Correspondence, Misc. Shareholder	Treasury	7
Correspondence	Rate	5
Correspondence	Fossil Fuel Procurement	10
Cost Reports	FERC	6 Years After Plant Retirement
Cost of Service Reports	Rate	5
CPR Balances	Property Accounting	10
CPR Transactions	Property Accounting	Permanent
Credit Rep's Daily Reports	Customer Services	1
Current Diversion Customers	Customer Services	2
Current & Potential Transformers (CPR Backup)	Property Accounting	10
Customer Balance and Control Registers	Customer Accounting	2
Customer Batches	Customer Accounting	3
Customer Bill Registers	Customer Accounting	6
Customer Files	Research & Development	5
Customer High Bill Complaints	Customer Services	1
Customer Job Estimates	Legal	5
Customer Job File	Marketing	10

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Customer Job Orders	Customer Accounting	6
Customer Service Complaints	Customer Services	3
Customer Service Orders	Customer Services	2
Customer Transfer Requests	Customer Services	3
Customer Information System Month End Balance	Customer Accounting	7
Customer Service Use Statements	Customer Services	6
<u>D</u>		
Daily Bank Statements	General Accounting	2
Daily Collection Reports	General Accounting	1
Daily Stock Transfer Sheets	Treasury	Permanent
Daily Work Logs (Cash Batch Logs)	Customer Accounting	6
Data Processing Records, Punch Card Tapes	FERC	Optional
Data Processing Program Documentation	FERC	While Active
Data Pulsating Recorder (DPR's) Summary Sheets	Research & Development	5
Davis-Besse Operating Invoices for CEI	General Accounting	7
Deeds	Legal	Permanent
Demand & Energy Data	Accounting Analysis	10
Demand Meter Month End Tapes	Customer Accounting	6
Depreciation Studies	Accounting Analysis	Permanent
Deposit Cards	Customer Accounting	Permanent
Detail Ledgers	General Accounting	Permanent
Disconnection for Non Payment (Seals)	Customer Services	3
Distribution Journals (by S/C)	General Accounting	Permanent

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Distribution Transformers, Conventional	Property Accounting	10
District Heating Studies	Research & Development	6
Dividend Notices to Shareholders	PUCO	Permanent
Dividend Registered Letters	PUCO	6
DPR Tapes	Data Processing	1
Drop Cards	Property Accounting	10
Drawings, As-Built	Various	Permanent
 <u>E</u>		
Easements	Legal	Permanent
EEL Committee Meeting Minutes	Various	Permanent
EIS Earnings & Adjustments	General Accounting	7
Electric Heat Studies	Research & Development	2
Electric Sales Statistics Worksheets (By Rate)	General Accounting	2
Employee Applications, Medical Records, Identification Records, Pertaining to Hiring	FERC	3 Years After Termination
Employee Benefit Program Records	FERC	Destroy at Option
Employee Individual Earnings Record	General Accounting	Permanent
Employee Service Records	FERC	3 Years After Termination
Employee and Wages Reports	FERC	5
Energy Supply Model	Corporate Planning	5
Engineering Economics	Corporate Planning	5
Engineering Records: Maps, Diagrams, Profiles, Plans, Photos, Studies in Connection With Construction Projects	PUCO	Until Super- seded or 6 Years After Plant is Retired
Envelopes, Night Depository	General Accounting	1

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Equipment Listings, General	Property Accounting	10
<u>F</u>		
Federal Excise Tax Reports	Operational Auditing	20
Federal Tax Exempt Billing	Treasury	Permanent
FERC Reports	Accounting Analysis	Permanent
Financial Letters, Departmental	Various	5
Financial Model Studies	Corporate Planning	10
Financing Data	Finance	50
Forms, Obsolete	Administrative Systems	Until Superseded
Franchises	Rate	Permanent
Fraud, Tampering, Theft Utility Service Records	Energy Investigation	3
Function Records, Construction	General Accounting	Permanent
Function Records, O&M	General Accounting	Permanent
Furniture Budget and Work Papers	Building & Office Services	3
<u>G</u>		
General Ledgers	General Accounting	Permanent
General Ledger Cash Stubs	General Accounting	6
<u>H</u>		
Handy-Whitman Index	Rate	10
Holding Company Files	Corporate Staff	Permanent
<u>I</u>		
IBM Equipment Invoicing	Data Processing	7
Indentures	Treasury	Permanent
Intangible Study	Property Accounting	10

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Installed Meter Listing	Customer Services	10
Insurance Bonds and Records Against Losses	PUCO	6
Insurance Policies and Related Records	PUCO	6 Years After Expiration
Insurance Companies, Recovery From	FERC/PUCO	6
Insurance Maps of Property and Structures	PUCO	6 Years After Revision
Interchange Pwr. to Fuel Cost Workpapers	General Accounting	7
Inventory Adjustment Reports	General Accounting	3
Inventory Tags	General Accounting	1
Invoices Paid by Voucher	General Accounting	25
IPCG Meeting Notes and Data	Accounting Analysis	10
IPCG Annual Reports	Accounting Analysis	20
IPCG Questionnaires, Non-Routine	Accounting Analysis	10
<u>J</u>		
Job Estimates	Distribution Engineering	10
Job Estimates, Underground and Transformer	Distribution Engineering	Permanent
Job Orders	Property Accounting	Permanent
Journal Vouchers	General Accounting	Permanent
<u>L</u>		
Labor Adjustment Batch Tickets	General Accounting	3
Licenses and Amendments for Construction and Operation of Plants	PUCO	Permanent
Load Survey Reports	Research & Development	5

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Loans to Officers and Employees	FERC	1 Year After Paid
Leases (Rental To/From)	PUCO	6 Years After Expiration
Lease/Purchase Analyses	Finance	10
<u>M</u>		
Magnetic Pulsating Records (MPR's)	Customer Accounting	5
Manufacturers Instruction Books (I's)	Transmission & Substations	Until Equip- ment Retired
Material Adjustment Tickets	General Accounting	4
Material Issue Tickets	General Accounting	4
Material and Supplies Catalog	Inventory Control	Until Superseded
Material and Supplies Transaction Record, Monthly	General Accounting	1
Material and Supplies Transaction Record, Yearly	General Accounting	6
Material and Supplies Transaction Register	General Accounting	1
Material and Supplies Transaction Summary	General Accounting	1
Materials and Supplies Usage History, By Month	General Accounting	2
Merchandise Accounts - Repairs/Ins.	Customer Accounting	6
Merchandise Control Sheets	Customer Accounting	6
Meter Deposit Books	Customer Services	Permanent
Meter Deposit Cards	Customer Services	Permanent
Meter Deposit Refund Requests	Customer Services	6 Years After Refund
Meter Reading Sheets, Demand Charts, Etc.	PUCO	3 Years After Superseded
Meter Records, Miscellaneous, Old	Customer Services	Permanent

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Meter Tag and Test Records	Customer Services	Permanent
Meter Tests	Customer Services	6
Meter Tests, Random	Customer Services	6
Miscellaneous Source Listings	Customer Accounting	6
Monthly Letters, Company	Accounting Analysis	Permanent
Monthly Letters, Departmental	Various	Optional
Monthly Tapes	Customer Accounting	6
Month End Tapes	Customer Accounting	6
 <u>N</u>		
New Service Requests	Service Processing	7
Newspaper Photos and Scrapbooks	Public Relations	Permanent
News Releases	Public Relations	Permanent
News Clippings	Public Relations	5
Night Deposit Reports & Envelopes	Customer Services	1
 <u>O</u>		
Ohio Bell Telephone Billing	Estimating	10
Ohio Department of Taxation Reports	Tax	Permanent
Operations and Maintenance Records	FERC	6
Operation and Maintenance Function Records	General Accounting	Permanent
Operational Auditing Records	Operational Auditing	7
Orders of Regulatory Commission	PUCO	Permanent
OS System Service Programs	Administrative System	Permanent
Output Control Registers	Data Processing	5
 <u>P</u>		
Paid Absence Reports	Personnel	7
Paid Merchandise Accounts	Customer Accounting	6

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Pay Envelopes, Weekly	General Accounting	7
Payroll & Dist. - Predecessor Co.	General Accounting	Permanent
Payroll Authorization	General Accounting	4
Payroll Checks	General Accounting	3
Payroll City Tax Records	General Accounting	10
Payroll Deduction Changes	General Accounting	4
Payroll Distribution	General Accounting	Permanent
Payroll Record of Garnishments	General Accounting	7
Payroll Register	General Accounting	Permanent
Payroll Tab Runs (Report)	General Accounting	7
Payroll Time Sheets	General Accounting	7
Pension/Annuity Payroll	FERC	6
Pension Accruals Computations	FERC	6 Years After Termination or Plan is Super- ceded
Performance Reports (Blue Book)	General Accounting	Permanent
Phase I, II Studies	Property Accounting	Permanent
Physical Inventory List (Truck)	General Accounting	3
Plant Changes - Units Added and Retired	FERC	10 Years After Plant Retired
Plant Inventory Ledgers	FERC	50
Plant Ledgers	Property Accounting	Permanent
Power Bill History Registers	Customer Accounting	1
Power Customer Billing	Rate	Permanent
Power Ledger Balance Tapes and Monthly Revision Listings	Customer Accounting	6
Power Ledger Books	Customer Accounting	9
Power Ledger, Monthly Trial Balance	Customer Accounting	6

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Power Production Report	General Accounting	Permanent
Power Production Work Papers	General Accounting	2
Private Outdoor Ltg Orders (POL)	Customer Services	2
Procedures Bulletins	Administrative Systems	Until Superseded
<u>Production - Non-Nuclear</u>		
Maintenance Work Orders	FERC	6
Boiler and Turbine Room Reports of Equipment in Service	FERC	3
Boiler Tube Failure Reports	FERC	3
Gage Reading Reports	FERC	2
Generation High Tension and Low Tension Load Records	FERC	3
Load Curves; Temperature, Coal and Water Logs	FERC	3
Logs: Boiler Room, Condenser Room, Turbine Room, Pump Room, and Supporting Data	FERC	3
Logs: Generation and Output, and Supporting Data	FERC	6
Oil and Waste Reports	FERC	3
Recording Instrument Charts	FERC	1
Station and System Generation Reports and Clearance Logs	FERC	25
<u>Production - Nuclear</u>	(Note: 1st Year's Operation to be Kept Until 10 Years After Plant Retirement)	
Records of Normal Plant Operation, Including Power Levels and Period of Operation at Each Power Level	FERC	6
Maintenance Activities, Including Inspection, Repair, Substitu- tion or Replacement of Principle Items of Equipment Pertaining to Nuclear Safety	FERC	6

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Abnormal Occurrence Records	FERC	6
Periodic Checks, Inspections and Calibrations Performed to Verify that Surveillance Requirements Are Being Met	FERC	6
Records and Prints of Plant Changes as Described in FSAR	FERC	10 Years After Plant Retirement
New and Spent Fuel Inventory and Assembly Histories	FERC	10 Years After Plant Retirement
Monthly Plant Radiation and Continuation Surveys	FERC	10 Years After Plant Retirement
Offsite Environmental Monitoring Surveys	FERC	10 Years After Plant Retirement
Operating Procedures Changes	FERC	10 Years After Plant Retirement
Radiation Exposure Records of Plant Personnel, Including Contractors and Visitors Who Enter Radiation Control Area	FERC	10 Years After Plant Retirement
Radioactive Shipment Records	FERC	6
Radioactivity in Liquid and Gaseous Wastes Released to the Environment	FERC	10 Years After Plant Retirement
Special Reactor Tests and Experiments	FERC	10 Years After Plant Retirement
Training and Qualifications for Plant Staff	Nuclear Technical Specification	Duration of License
Inservice Inspections Performed to Tech Specs	Nuclear Technical Specification	Duration of License
Quality Assurance Activities required by QA Program	Nuclear Technical Specification	Duration of License

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Company Nuclear Review Board Meeting Minutes	Nuclear Technical Specification	Duration of License
Station Review Board Meeting Minutes	Nuclear Technical Specification	Duration of License

(End of Production - Nuclear)

Property Accounting Director Files	Property Accounting	3
Proxy	Treasury	6
Proxy Statement	Treasury	10
Proxy Tabulations	Treasury	6
PUCO Complaints	Rate	3
PUCO Reports	Accounting Analysis	Permanent
PUCO Rule 26 Monthly Reports	General Accounting	Permanent
Purchase Orders, Accounting Copy	General Accounting	6
Purchase Orders, Purchasing Copy	Purchasing	6
Purchase Orders, Receiver (Attached to Voucher)	General Accounting	25
Purchase and Sale of Utility Property	FERC	10 Years After Plant Retired
PURPA Reports	Rate	5

Q

Quarterly Stockholders Report	Treasury	10
Quotation Jackets	Purchasing	Permanent

R

Rate Case (PUCO File)	Rate	Permanent
Rate Case Duplicate File	Rate	10
Rate Case Extra Copies	Rate	5
Rate Ordinance Negotiations	Rate	Permanent

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Rate Sheets	Rate	1 Copy Permanent. Extras Until Superseded
Rate Summaries (PV-1 and GS-12)	Rate	Permanent
Rates, Proposed and Workpapers	Rate	10
Records Destruction Lists	Records Management	Permanent
Records Transactions	Records Management	1
Regulatory Commission Reports	PUCO/FERC	Annual Reports Permanent; Other Reports, 3 Years.
R & D Surveys	Research & Development	5
Releases, News	Public Relations	Permanent
Repairs and Insurance	Customer Accounting	6
Responsibility Report - December	General Accounting	Permanent
Responsibility Report - Monthly	General Accounting	5
Revenue by District	General Accounting	7
Revenue by Town Code	General Accounting	7
Revenue Summary Ledgers	Customer Accounting	6
RPO's	Customer Accounting	14 Months
<u>S</u>		
Sale of Utility Plant Records and Supporting Papers	FERC	3 Years After Settlement
Sales Tax Reports, State	Tax	20
Seals (Disconnections)	Customer Services	3
Securities Sales Offers	PUCO	Permanent
Securities-Owned Records	Treasury	Permanent
Security Exchange Comm. (SEC) 10K	Treasury	Permanent

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Service Heat Loss (JV604) Detail	Customer Accounting	6
Service Requests, Completed	Administrative Systems	3
SIC Data Runs	Accounting Analysis	20
Source Code Analysis Sheets	General Accounting	7
Source Copies	Customer Accounting	6
Special Billing Records	Customer Accounting	6
State Heating Discount (Monthly Listings, Reconciliations)	Customer Accounting	6
Statistical Reports, Miscellaneous Internal	FERC	Optional
Steam Ledgers	Customer Accounting	6
Steam Reading Cards	Customer Accounting	6
Steam, Temporary Service	Customer Accounting	6
Stock Balance Record	General Accounting	Permanent
Stock Certificates, Cancelled	Treasury	Permanent
Stock Code Change Sheets	Purchasing & Stores	5 (Q, Permanent)
Stock Issue Tickets (Material)	General Accounting	4
Stock Status Report, Monthly	General Accounting	4
Stock Status by Storeroom	General Accounting	4
Stop Payment File	General Accounting	7
Street Lighting Control Data	Customer Accounting	6
Street Lighting Control Ledger	Customer Accounting	9
Street Lighting Ledgers, City of Toledo	Customer Accounting	9
Street Lighting Work Orders	Customer Accounting	3
Subsidiary Ledger	General Accounting	Permanent
Summary Coal Cost Report	General Accounting	5
Supervisory & Engr. Allocation	Accounting Analysis	Permanent
System Studies (R's)	Relay & Control	Permanent

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Systems Studies, Miscellaneous	Administrative Systems	5
<u>I</u>		
Tab Machine Accounting Records, Cards, Tapes	PUCO	6 Years After Exam and Certi- fication by PUCO
Tax Records, Returns and Supporting Data	PUCO	5 Years After Settlement or Payment
Temporary Service Transfers	Customer Accounting	6
Ten Year Forecasts	Corporate Planning	10
Buckeye Power		
Cincinnati		
Gas & Electric		
CEI		
Columbus & Southern		
Dayton P&L		
Duquesne Light		
Monongahela Power		
Ohio Edison		
Ohio Power		
Ohio Valley Electric		
Toledo Edison		20
Terminated Employees	Personnel	Permanent
Traffic Signal Billing, City of Toledo	Customer Accounting	6
Transactions With Associated Companies	FERC	6
Travel Arrangements	Purchasing	10
<u>Transmission & Distribution</u>		
Substation & Transmission Line Logs	FERC	3
System Operator Daily Logs and Reports	FERC	3
Storage Battery and Other Equipment Logs and Records	FERC	3
Interruption Logs and Reports	FERC	6
Substation General Inspection and Operation Tests	FERC	3
Apparatus Failure Reports	FERC	6

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Line Trouble Reports and Records	FERC	3
Lightning Data	FERC	6
Insulator Test Records	FERC	3
Street Opening Inspections and Repairs	FERC	6
Meter Shop Reports	FERC	3
Meter History	FERC	Life of Meter
Transformer History	FERC	Life of Transformer
Transformer Inspections	FERC	Destroy at Option
Oil Tests	FERC	Destroy at Option
Pole, Tower, Structure and Other Equipment History	FERC	Life of Equipment
Inspection of Customer Premises	FERC	2
Survey of Customer Premises re Type of Service and Equipment to Install	FERC	2

(End of Transmission Distribution)

U

U. S. Savings Bond Register	General Accounting	7
Underground Service Agreements	Property Accounting	Permanent
Uniform Statistical Report: Toledo Edison Cincinnati Gas & Electric CEI Columbus & Southern Dayton Power & Light Duquesne Light Monongahela Power Ohio Edison Ohio Power Ohio Valley Electric	Accounting Analysis	Permanent
Uniform Statistical Report: Other	Accounting Analysis	5
Union Contracts (Vault)	Personnel	Permanent

<u>Title of Record</u>	<u>Authority</u>	<u>Retention Period (Years)</u>
Unpaid Receipts Report, Monthly	General Accounting	1
<u>V</u>		
Vacation Pay Accruals	General Accounting	7
Variable Parameter File (VPF) and Worksheets	Customer Accounting	15 Months
Vehicle and Equipment Usage Reports	General Accounting	6
Vehicle Mileage Reports	General Accounting	2
Visitors Log	Building & Office Services	6 Months
Voting Lists, Common Stock	Treasury	3
Voucher Index Register	General Accounting	25
Voucher Insert Copies	General Accounting	1
Voucher Check Register	General Accounting	Permanent
Vouchers - Toledo Trust, Irving Trust, Davis-Besse	General Accounting	25
<u>W</u>		
Wage Increase Folders	General Accounting	7
Weekly Pay Envelopes	General Accounting	7
Work-In-Progress Trial Balance	General Accounting	Permanent
Work Order Sheets for Construction	FERC	6 Years After Plant Retired
Work Orders for Construction or Retirement and Supplemental Records	PUCO	6 Years After Exam and Cer- tification by PUCO
<u>Y</u>		
Year End Reports	Property Accounting	10
<u>Z</u>		
Zero Balance	Property Accounting	10